

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

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**JOAN WHITE,**  
  
**Plaintiff,**

**VS.**

**NO:** \_\_\_\_\_

**AIG LIFE INSURANCE,**  
  
**Defendant.**

**JURY DEMANDED**

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**COMPLAINT FOR LIFE INSURANCE BENEFITS**

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Comes, now the Plaintiff, Joan White, and files the Complaint to recover life insurance benefits rightfully hers, and would state to the Court as follows:

**Jurisdiction and Venue**

1. Plaintiff, Joan White, is a citizen of the United States, a resident citizen of Shelby County, Tennessee.

2. Defendant, AIG, Life Insurance (hereinafter AIG) is a life insurance company and is charged with managing life insurance benefits. AIG's principal place of business is Rockward Office Park, P. O. Box 667, Wilmington, Delaware, 19899-0667.

**Facts**

3. Plaintiff, Joan White, is the widow of James R. White, who died of natural causes on June 8, 2007.

4. AIG policy fully matured upon the death of Mr. James R. White June 8, 2007 and the insurance policy provided among other things that in the

event of the death of the insured that the defendant would pay to the rightful beneficiary Joan White the sum of \$50,000.00.

5. The Insured died on June 8, 2007 while the policy was in full force and effect and in the required time Plaintiff submitted due proof of death of insured to Defendant and demanded in writing payment in sum of \$50,000.00 payable under the policy if a claim has not been paid to Plaintiff.
6. Plaintiff and insured have preformed all conditions of the policy on their part to be performed, and there is now due and owing to plaintiff under policy of insurance the sum of FIFTY THOUSAND (\$50,000.00) DOLLARDS.
7. Because of the refusal of Defendant AIG, to pay Plaintiff's claim, Plaintiff has been compelled to employ counsel to bring this action. Plaintiff is entitled to reasonable attorney fee for necessary services and related costs of this action.

### **Relief**

WHEREFORE, Plaintiff, would respectfully pray that this Honorable Court enter an Order directing Defendant AIG to pay the AIG benefits to Plaintiff, Joan White.

Plaintiff, be allowed to freely amend this complaint and have other relief, as this Honorable Court deems proper and a jury to hear this matter.

Respectfully submitted,

/s/ Arch B. Boyd III

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